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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 21-CR-000198-EMC
Plaintiff,)	
v.)	STIPULATION TO EXCLUDE TIME UNDER THE
)	SPEEDY TRIAL ACT FROM JUNE 9, 2021 TO
CIAN BURLEY,)	AUGUST 11, 2021 AND [PROPOSED] ORDER
Defendant.)	

It is hereby stipulated by and between counsel for the United States and counsel for the defendant, Cian Burley, that time be excluded under the Speedy Trial Act from June 9, 2021 through August 11, 2021.

At the initial status conference held before the Honorable Edward M. Chen, U.S. District Judge, on June 9, 2021, the government and counsel for the defendant agreed that time be excluded under the Speedy Trial Act so that defense counsel could continue to prepare, including by reviewing discovery. The government reported that it had produced all discovery to date. However, defense counsel indicated that she would submit a supplemental discovery request later that day to the government. Accordingly, the parties requested to continue the matter for approximately 60 days so that the government could produce additional discovery pursuant to defense counsel's request, and defense counsel would need

1 additional time to review the new discovery. The government is gathering these additional discovery
2 materials and will produce them to defense counsel shortly. For this reason and as further stated on the
3 record at the status conference, the parties stipulate and agree that excluding time until August 11, 2021
4 will allow for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties
5 further stipulate and agree that the ends of justice served by excluding time from June 9, 2021 to August
6 11, 2021 from computation under the Speedy Trial Act outweigh the best interests of the public and the
7 defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv). The failure to grant this exclusion of
8 time would unreasonably deny defense counsel the reasonable time necessary for effective preparation,
9 taking into account the exercise of due diligence.

10 The undersigned Assistant United States Attorney certifies that she has obtained approval from
11 counsel for the defendant to file this stipulation and proposed order.

12
13 IT IS SO STIPULATED.

14 DATED: August 2, 2021

/s/

YOOSUN KOH
Assistant United States Attorney

15
16 DATED: August 2, 2021

/s/


GABRIELA BISCHOF
Counsel for Defendant Cian Burley

~~[PROPOSED]~~ ORDER

Based upon the facts set forth in the stipulation of the parties and the representations made to the Court on June 9, 2021 and for good cause shown, the Court finds that failing to exclude the time from June 9, 2021 through August 11, 2021 would unreasonably deny defense counsel and the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from June 9, 2021 to August 11, 2021 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time from June 9, 2021 through August 11, 2021 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

IT IS SO ORDERED.

DATED: August 2, 2021



HON. EDWARD M. CHEN
United States District Judge